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April 4, 2025

VIA ECF FILING

Hon. Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, New York 10007

Re: *Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL;*
Wayfarer Studios LLC et al. v. Lively et al., No. 1:25-cv-00449-LJL

Dear Judge Liman:

We are U.S. counsel to Family Hive LLC d/b/a Blake Brown Beauty (“Blake Brown”) and to Give Back Beauty International LLC (“GBB”), a member and business partner of Blake Brown, and write with regard to the March 13, 2025 Protective Order entered in the above-referenced actions (Dkts. 125 and 74, respectively).

Section 10 of the Protective Order authorizes third-parties, such as Blake Brown and GBB in this instance, to petition the Court for a protective order or similar safeguards to the extent that Discovery Material (defined in Section 1) is requested which implicates contractual or other obligations of confidentiality owed to a third-party, in this case, Blake Brown and GBB. We are informed that discovery requests to the Plaintiff (the ‘First Request for Protection’) implicate Discovery Material which we caution invokes confidentiality obligations important to Blake Brown and GBB. To the extent the parties request or seek to produce Discovery Material which implicates confidentiality and other obligations owed to Blake Brown and GBB, including trade secrets; proprietary information; confidential information related to trade and business practices and relationships; or similar information or data which implicates confidentiality and similar concerns, Blake Brown / GBB will exercise its right to seek such Court protection.

We have executed the NDA accompanying the Protective Order and will maintain the confidentiality of any discovery demand or Discovery Material furnished to us. We also will work with counsel to avoid motion practice with regard to AEO or confidentiality designations on responsive Discovery Material.

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Protecting Blake Brown and GBB confidential agreements, information, trade and business practices in the very competitive beauty and health care business is important to all parties involved in the industry, especially when implicating business arrangements with international celebrities.

We thank the court for its attention to this important matter.

Respectfully submitted,

/s/ Samuel D. Levy

Samuel D. Levy

C: All counsel of record (via ECF)